United States Environmental Protection Agency Region I POLLUTION REPORT

Date: Thursday, August 10, 2006

From: Frank Gardner, On-Scene Coordinator

Subject: Initiation of Action

John J Riley Site

228-240 Salem Street, Woburn, MA

Latitude: 42.4903 Longitude: -71.1342

POLREP No.: 1 **Site #:** 01DE

Reporting Period: D.O. #:

Start Date:8/1/2006Response Authority:CERCLAMob Date:8/1/2006Response Type:Time-CriticalCompletion Date:NPL Status:Non NPL

CERCLIS ID #: MAD001035872 **Incident Category:** Removal Action

RCRIS ID #: MAD001035872 Contract #

Site Description

The Site is located in a mixed residential, commercial, and industrial area of Woburn and is the former location of the Riley Tannery, which operated at the Site from approximately 1915 until 1989. According to MassDEP files, the tannery used hexavalent chromium as a raw material for a "chrome tanning" process to produce shoe leather from animal hides.

The Site is bounded by Wildwood Avenue to the west, Salem Street and residences to the south, railroad tracks to the east, and other commercial properties to the north. The 15.8 acre site is highly developed and is characterized by level topography, except for a wooded, steeply sloped ravine/drainage swale in the north. This surface water pathway flows eastward toward the Wells G&H Superfund Site, the Aberjona River, and its associated wetlands within ½ mile to the east.

As a result of the subdivision and redevelopment of the Site from 1994-1997 for commercial and industrial use, the Site currently consists of the following four active commercial and industrial properties: Charls Ice Cream, Organix, Inc., New England Industrial Truck, and W.A Kraft. The portion of the Site on which this chromium contamination is located is owned by Organix, LLC (Organix) and operated by Organix, Inc.

The site was referred to the Emergency Planning and Response Branch on January 13, 2005 by the Superfund remedial program, which is working on the Wells G&H Superfund Site, which abuts the Site to the east. This Site was identified as a potential candidate for a removal action based on the potential presence of chromium-contaminated surface soils. On August 11, 2005, EPA and the Massachusetts Department of Environmental Protection (MassDEP) conducted a joint site investigation which included the collection of surface soils. These samples, which were analyzed at EPA's New England Regional Laboratory, documented the presence of high levels (up to 86,000 mg/kg) of chromium contamination in surface soils in the northern swale area. The site investigation documented that: 1) the chromium-contaminated soils pose a direct contact threat to those who

may enter the Site, 2) unauthorized individuals have accessed the contaminated area, and 3) the chromium may pose a threat of downstream migration. The site investigation was closed on March 15, 2006 with a recommendation that a time critical removal action be conducted.

Current Activities

Organix entered into an Administrative Settlement Agreement and Order on Consent (ASAOC) with EPA on June 30, 2006 to conduct a time critical removal action to address the chromium contamination located on its property. Toward this end, Organix has developed a work plan entitled "Revised Scope of Work Deliverable", which was approved by EPA on June 30, 2006. The work plan calls for the elimination of the threats posed by the contamination via a combination of excavation and/or covering the material in place, sampling and monitoring, off-site disposal of cleanup-generated wastes, and repairing response-related damage to affected areas of the Site.

On August 1, 2006, Organix conducted a site walk with its cleanup contractor and began clearing and grubbing and other site preparation activities.

Next Steps

Excavation of the chromium-contaminated soils is schedule to begin on August 14, 2006. Upon completion of excavation activities, remaining contaminated soils, if present, which can not be safely excavated, or which may remain at depth, may be covered with clean backfill. Organix may also regrade the swale area to reduce the possibility of future erosion.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$0.00	\$100,000.00	100.00%
START Contractor	\$30,000.00	\$0.00	\$30,000.00	100.00%
Contingency	\$13,000.00	\$0.00	\$13,000.00	100.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$57,000.00	\$1,464.00	\$55,536.00	97.43%
Total Site Costs	\$200,000.00	\$1,464.00	\$198,536.00	99.27%

^{*} The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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